

THE LAW OFFICE OF
RICK S. COWLE
18 FAIR STREET
CARMEL, NEW YORK 10512

ADMITTED IN NY, CT
& WASHINGTON D.C.
E-MAIL: rick@rcowlelaw.com
WEB: rcowlelaw.com

TELEPHONE (845) 225-3026
FACSIMILE (845) 225-3027

April 11, 2025

Honorable Jessica G. L. Clarke
500 Pearl St.
New York, NY 10007-1312

RE: Cowle v. U.S. Department of Education; 7:24-cv-08111-JGLC.

Dear Judge Clarke:

Our office represents Plaintiff in the above-captioned matter. With the consent of all parties, I write to provide a status update as directed by the Court. ECF Dkt. No. 19.

In this action, Plaintiff seeks to have her student loan debt forgiven based on, inter alia, alleged fraud perpetrated by the college she attended. The parties have exchanged pertinent documents with one another without the use of formal discovery tools. At this time, we believe that paper discovery is substantially complete, but the parties have agreed to provide supplemental discovery should the need arise.

The parties have not taken depositions in light of ongoing settlement negotiations amongst themselves at first and later through a planned settlement conference before Magistrate Judge Krause. As the avenues of available administrative relief available from the Department of Education have recently changed, however, it was determined that going forward with a settlement conference would not be fruitful. The parties continue to engage in discussions about ways to resolve this case. In the meantime, the parties respectfully request 60 days to complete any additional discovery, and respectfully propose thereafter submitting a letter to the Court requesting a post-discovery status conference.

Respectfully,

/s/ Rick S. Cowle
Rick S. Cowle, Esq.